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ADYEN, N.V.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

JOE MENDONCA, an individual
Plaintiff,
vs.
ADYEN, N.V., a Federally Chartered
Bank; and DOES 1 through 20,
inclusive,
Defendants.

CASE NO. 5:23-CV-2211

**DECLARATION OF
AYUSHI NEOGI IN SUPPORT
OF DEFENDANT'S NOTICE OF
REMOVAL OF ACTION UNDER
28 U.S.C. §§ 1332, 1441, AND 1446**

I, Ayushi Neogi, declare as follows:

1. This declaration is submitted in support of Defendant ADYEN N.V.'s ("Defendant") Notice of Removal to the United States District Court for the Central District of California under 28 U.S.C. § 1332, 1441 and 1446.

2. I am an attorney at law licensed to practice before all courts of the State of California and the United States District Court for the Central District of California. I am an associate in the law firm of Gordon Rees Scully Mansukhani, LLP and attorney of record for Defendant ADYEN, N.V., a diverse defendant for purposes of diversity jurisdiction. I am a member in good standing with the State

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1 Bar of California. I have personal knowledge of the matters contained in this
2 declaration and if called to testify to them could and would do so competently.

3 3. In executing this declaration, I do not intend, and Defendant has not
4 authorized me, to waive any protections or privileges Defendant may have as to
5 proprietary, trade secret, and/or confidential information, or to waive Defendant's
6 attorney-client privileges as to any of their communications or to waive the work
7 product immunity developed in anticipation of or in response to litigation. I intend
8 only to describe certain factual matters that are pertinent to this declaration.

9 4. On June 5, 2023, Plaintiff Joe Mendonca ("Plaintiff") filed this action
10 in the Superior Court of the State of California, Riverside County, entitled *Joe*
11 *Mendonca v. Ayden, Inc.*, Case No. CVRI2303416. Plaintiff alleges various
12 violations under the Fair Employment and Housing Act and Title VII of the Civil
13 Rights Act against Ayden, Inc. On July 6, 2023, Plaintiff filed a First Amended
14 Complaint to replace "Ayden, Inc." with "Adyen, Inc.," entitled *Joe Mendonca v.*
15 *Adyen, Inc.*, Case No. CVRI2303416. A true and correct copy of the Summons
16 and First Amended Complaint are attached hereto as **Exhibit A**.

17 5. On September 27, 2023, Plaintiff filed a Second Amended Complaint
18 to amend his complaint to replace "Adyen, Inc." with "ADYEN N.V.," entitled
19 *Joe Mendonca v. Adyen, N.V.*, Case No. CVRI2303416 (hereinafter "the
20 Complaint"). A true and correct copy of the Summons and Second Amended
21 Complaint are attached hereto as **Exhibit B**.

22 6. On October 25, 2023, Defendant filed an Answer to Plaintiff's Second
23 Amended Complaint pursuant to California Code of Civil Procedure section
24 431.30 in the Superior Court of the State of California, County of Riverside. A
25 true and correct copy of Defendant's Answer to Plaintiff's Second Amended
26 Complaint is attached hereto as **Exhibit C**.

27 7. Defendant now files its Notice of Removal within 30 days of service
28 of the Complaint on Defendant.

